

National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



February 27, 2013

General Law Practice Group

Reply to Attn of:

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at a Scholarship Dinner and Reception Sponsored by the Vietnamese American Bar Association GW Law School on March 19, 2013

On March 19, 2013, the Vietnamese American Bar Association of the Greater Washington, D.C. Area (VABA-DC) and George Washington University Law School's Asian Pacific Law Students Association will host a reception and dinner at GW's Marvin Center, Continental Ballroom from 6 p.m. to 9 p.m. The dinner will honor Vietnamese law students who have overcome adversity to obtain a legal education, and will celebrate the award of scholarships to two current students. The keynote speaker will be Dr. Eugene Trinh, a former NASA executive and astronaut. VABA-DC controls determinations for the seating and guest list.

This event will bring together a diverse group of attorneys from the public, private and academic sectors, as well as representatives from professional associations and various Federal agencies. Approximately 150 people will attend the scholarship dinner and reception. The cost of a ticket for government and non-profit participants is \$65. I find that these events meet the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g).

I further determine that there is an Agency interest in having NASA personnel attend this event because attendance will further Agency programs and operations. Attendance at the reception and dinner will allow NASA representatives to discuss NASA's programs and plans, including but not limited to developments in NASA's legal practice, with the other attendees. Accordingly, NASA employees – including NASA employees in non-career positions required to sign the ethics pledge under Executive Order 13490 – whose duties do not substantially affect the sponsors may accept an invitation for free attendance for themselves and their invited spouse or guests.

However, NASA employees whose duties do substantially affect the sponsors such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. §2635.205(g)(3)(i) regarding participation in this event from their local ethics counselor.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone".

Adam F. Greenstone